

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

VICENTA ANDINO AND EDWIN
ANDINO,

Plaintiffs,

v.

MERCANTILE ADJUSTMENT BUREAU,
LLC,

Defendant.

Civil Action No.: 1:14-cv-00059-JTC

**DEFENDANT MERCANTILE ADJUSTMENT BUREAU, LLC'S
NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE, that upon the attached Defendant Mercantile Adjustment Bureau, LLC's Local Rule 56(a) Statement of Material Facts In Support of Summary Judgment; Defendant's Appendix to its Local Rule 56(a) Statement of Materials Facts, with attached Declaration of Aaron R. Easley, Esq.; Declaration of Della Mea; the attached Exhibits to the Appendix; the Memorandum of Law in Support of Summary Judgment; and all the prior pleadings and proceedings heretofore had herein, Defendant Mercantile Adjustment Bureau by and through its attorneys Sessions, Fishman, Nathan and Israel, LLC, will move this Court before the Honorable John T. Curtin, Senior United States District Court Judge for the Western District of New York, at the United States Courthouse, 2 Niagara Square, Buffalo, NY 14202, at a date and time to be set by the Court, for an Order pursuant to Federal Rule of Civil Procedure 56, dismissing Plaintiff's Complaint and granting summary judgment in favor of Defendant Mercantile Adjustment Bureau, LLC, and for such other further relief as may be just and proper.

Dated: October 15, 2015

Respectfully submitted,

/s/ Aaron R. Easley

Aaron R. Easley, Esq.

New York Bar No.: 2823797

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.

3 Cross Creek Drive

Flemington, NJ 08822-4938

Telephone No.: (908) 237-1660

Facsimile No.: (908) 237-1663

Email: aeasley@sessions-law.biz